

UNITED STATES OF AMERICA :
 :
 v. : CRIMINAL NO.:
 :
 JONATHAN BELL : DATE FILED:
 :
 : VIOLATIONS: 18 U.S.C. § 1344
 : (Bank fraud - 1 count)
 : 18 U.S.C. § 2
 : (Aiding and abetting)
 : (Notice of forfeiture)

COUNT ONE

At all times material to this information:

2. PNC Bank, Asset Management and Trust Services, was responsible for issuing trust account checks on a periodic basis to various account holders located in the United States.

JONATHAN BELL

knowingly executed and attempted to execute, and aided and abetted the execution of, a scheme

to defraud PNC Bank and to obtain the monies, funds, credits, assets, securities, and other property owned by, and under the custody or control of that bank, by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

It was part of the scheme that:

4. Between in or about December 1998 and in or about January 1999, defendant JONATHAN BELL obtained six stolen PNC Bank checks from an individual known to the United States Attorney, totaling \$49,612.02. These six checks were all payable and addressed to different account holders located in Florida, Georgia, Louisiana and Pennsylvania.

5. Defendant JONATHAN BELL negotiated two of the stolen checks, check nos. 2699767 and 15658, which contained forged payees' endorsements on the back of the checks, by presenting them for deposit into his checking account at National Penn Bank. BELL then withdrew cash totalling the approximate amounts of the two stolen PNC checks from his checking account.

6. Defendant JONATHAN BELL gave four of the stolen checks, which contained forged payees' endorsements on the back of the checks, to two individuals known to the United States Attorney. These two individuals each presented one of the four stolen checks received from BELL for deposit into their personal checking accounts. These two individuals then attempted to withdraw cash in the approximate amount of the stolen PNC checks from their respective checking accounts. Each of these individuals, in turn, gave the remaining two stolen PNC checks to a third and fourth individual who each deposited one stolen check into their checking accounts and then attempted to withdraw the approximate amount of the deposited

check in cash.

All in violation of Title 18, United States Code, Sections 1344 and 2.

NOTICE OF FORFEITURE

As a result of the violation of Title 18, United States Code, Section 1344, set forth in count one of this information, defendant

JONATHAN BELL

shall forfeit to the United States under Title 18, United States Code, Section 982(a)(2)(A):

Any and all real and/or personal property constituting, or derived from, any proceeds obtained directly or indirectly as a result of the violation of Title 18, United States Code, Section 1344, as charged in this information, including but not limited to \$49,612.02.

If any of the property described above is being subject to forfeiture, as a result of any act or admission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) had been commingled with other property which cannot be divided without difficulty;

It is the intent of the United States, Title 18, United States Code, Section 982(a)(2)(A) to seek forfeiture of any other property of said defendant up to the value of said property listed above as being subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2)(A).

PATRICK L. MEEHAN
United States Attorney